

June 18, 2021

The Hon. Sarah Netburn
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Stansell v. FARC et al.*, Case No. 1:16-mc-00405 (LGS)(SN)
Pescatore v. Palmera Pineda & FARC, Case No. 1:18-000545 (LGS)(SN) (Related Case)
Proposed briefing schedule on competing creditor collateral attacks

Dear Judge Netburn:

The Stansell and Pescatore Plaintiffs and Intervenor Antonio Caballero submit this joint letter with their proposed briefing schedule pursuant to the Court's instructions during the June 14, 2021 status hearing:

- Stansell/Pescatore joint motion for summary/declaratory judgment on their crossclaims July 30, 2021
- Caballero response thereto August 25, 2021
- Stansell/Pescatore joint reply thereto September 24, 2021

- Caballero's motion to dismiss Stansell/Pescatore crossclaims July 30, 2021
- Stansell/Pescatore joint response August 25, 2021
- Caballero's reply thereto September 24, 2021

Respectfully submitted,

/s/ Newt Porter and Tony Korvick for Stansell Plaintiffs

/s/ Nathaniel Tarnor for Pescatore Plaintiffs

/s/ Joseph Zumpano, Leon Patricios, and Nicholas Rostow for Third Party Defendant Antonio Caballero